

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

CASE NO. 3:13-CR-076-N

V.

MICHAEL DAVID CARROLL

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, **Michael David Carroll**, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

_____ Crime of violence (18 U.S.C. §3156);

_____ Maximum sentence life imprisonment or death

_____ 10 + year drug offense

_____ Felony, with two prior convictions in above categories

 X Serious risk defendant will flee

_____ Serious risk obstruction of justice

_____ Felony involving a minor victim

_____ Felony involving a firearm, destructive device, or any other
dangerous weapon

_____ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

 X Defendant's appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

 Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

 Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

 At first appearance

 X After continuance of 3 days.

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DATED this 2nd day of June, 2021.

Respectfully submitted,

PRERAK SHAH
ACTING UNITED STATES ATTORNEY

s/ David L. Jarvis

DAVID L. JARVIS

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CERTIFICATE OF SERVICE

I hereby certify on June 2, 2021, that a copy of the foregoing will be served via ECF electronic notice on counsel for the defendant, in accordance with the Federal Rules of Criminal Procedure, whenever a defense counsel files a formal Notice of Appearance in this case.

s/ David L. Jarvis

DAVID L. JARVIS

Assistant United States Attorney